

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

David A. Jerri, Sr.	:	Chapter 13
	:	
Debtor	:	Case No.: 20-11263-amc

MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY

Comes Now, David A. Jerri, Sr., hereinafter referred to as "Debtor" and moves this Honorable Court to vacate its July 7, 2021 Order Modifying Section 362 Automatic Stay and in support thereof avers the following:

1. The above captioned bankruptcy matter was filed as a Chapter 13 on February 28, 2020.
2. The Chapter 13 bankruptcy matter was assigned case number 20-11263.
3. The Chapter 13 Plan was confirmed by this Honorable Court on September 1, 2020.
4. On or about January 14, 2021, Debtor and Wilmington Savings Fund Society, et al (hereinafter referred to as "Wilmington") entered into a Stipulation wherein Debtor agreed to cure Post-petition arrears.
5. On June 16, 2021, A Certification of Default was filed on behalf of Wilmington.
6. On July 7, 2021 this Court entered an Order in favor of Wilmington for Relief from the Automatic Stay.
8. Debtor believed he was current in payments to Wilmington under the terms of the Stipulation and has determined the lack of payment was due to an inadvertent accounting error.

9. The Debtor is desirous of keeping his real property located at 400 Louise Avenue, Croydon, PA 19021 and to that aim will pay any and all post-petition delinquencies by or before the hearing on the instant Motion.

WHEREFORE, for the reasons stated herein, the Debtor respectfully request that this Honorable Court Vacate July 7, 2021 Order Modifying the Automatic Stay.

Respectfully submitted,

Dated: July 26, 2021

/s/ Brad J. Sadek, Esquire
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